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Counsel for Non-Party Season 4, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: 3M COMBAT ARMS
EARPLUG PRODUCTS LIABILITY
LITIGATION

Civil Action No.: _____

Lead case: 3:19-md-2885 (N.D. Fla.)

MOTION DATE: October 4, 2021

**NON-PARTY MOVANT'S NOTICE
OF MOTION TO QUASH AND FOR A
PROTECTIVE ORDER**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, on October 4, 2021, at 10:00 a.m. or as soon thereafter as counsel may be heard, non-party Season 4, LLC shall move, at the United States District Court for the District of New Jersey in Trenton, New Jersey for an Order granting Season 4's Motion to Quash and for a Protective Order concerning the subpoena issued by defendants 3M Company, 3M Occupational

Safety LLC, Aeero Holding LLC, Aeero Intermediate LLC, Aeero LLC, and Aeero Technologies LLC.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Season 4 shall rely upon the accompanying Brief and the September 3, 2021 Declaration of Dominique J. Carroll, Esq. (and the exhibits thereto).

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that the moving party requests oral argument.

Dated: September 3, 2021

Respectfully Submitted,

FOX ROTHSCHILD LLP

/s/ Dominique J. Carroll

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